

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	
	§	CASE NO. 23-30252-hcm
PASO DEL NORTE MATERIALS, LLC,	§	
	§	CHAPTER 11
DEBTOR.	§	

WALLWORK FINANCIAL CORPORATION’S WITNESS AND EXHIBIT LIST

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Wallwork Financial Corporation (“Wallwork”), files this its Witness and Exhibit List in connection with the hearing set for July 26, 2023 at 1:00 p.m. (MST) on the Motion for Relief from Automatic Stay, or Alternatively, Motion for Adequate Protection Regarding Equipment [Doc. # 91] as follows:

WITNESSES

Wallwork reserves the right to call the below referenced witnesses for testimony at the trial setting including the following:

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Attorney for Wallwork

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Chief Credit Officer at Wallwork

Joe A. Rosales, Jr.

c/o E.P. Bud Kirk
600 Sunland Park Drive
Building Four, Ste. 400
El Paso, Texas 79912
Telephone: 915-584-3773
Facsimile: 915-581-3452

Representative for Debtor

E.P. Bud Kirk

600 Sunland Park Drive
Building Four, Ste. 400
El Paso, Texas 79912
Telephone: 915-584-3773
Facsimile: 915-581-3452

Attorney for Debtor

Wallwork reserves the right to call any other witness designated or identified by any other party at the hearing for purpose of examination at the hearing and/or any rebuttal witness.

EXHIBITS

Ex. #	Description	Offered	Objection	Admitted	Disposition
WW-A	Affidavit in Support of Motion for Relief from Automatic Stay Regarding Equipment				
WW-B	Combination Note and Security Agreement No. 14298-002				
WW-C	Texas Certificates of Title for Note No. 14298-002				
WW-D	Combination Note and Security Agreement No. 14298-003				

WW-E	UCC Financing Statement, File No. 200036484017 for Note No. 14298-003				
WW-F	Combination Note and Security Agreement No. 14298-004				
WW-G	UCC-1 Financing Statement, File No. 00200053457288 for Note. No. 14298-004				

Wallwork requests that the Court take judicial notice of Debtor's Schedules, Statement of Financial Affairs, and any amendments thereto.

Wallwork reserves the right to amend its Exhibit List and/or supplement the same. Wallwork further reserves the right to introduce any document designated by any other party in-interest, as well as any rebuttal documents.

Respectfully Submitted,

PADFIELD & STOUT, L.L.P.
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/s/ Christopher V. Arisco

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Attorneys for Wallwork Financial Corporation

CERTIFICATE OF SERVICE

The undersigned converted the foregoing document into an electronic image, via portable document format (.pdf), electronically submitted same to the Internet web portal for the Clerk of this Court utilizing the Electronic Management and Electronic Case Filing system of the Court, which has caused service, via Simple Mail Transfer Protocol (e-mail), of a Notice of Electronic Filing of this imaged document to the below-identified parties on Thursday, July 20, 2023; said e-mail provides an attributable hyperlink to the document, in portable document format, except for Debtor(s), and any other entity so identified below or on the EM/ECF filing sheet, whereas in that instance such document was mailed via First Class United States Mail, to-wit:

Paso Del Norte Materials, LLC 8000 Escobar Dr. El Paso, Texas 79907 <i>Debtor</i>	E.P. Bud Kirk 600 Sunland Park Dr. Building Four, Ste. 400 El Paso, Texas 79912 <i>Attorney for Debtor</i>
United States Trustee Office of the United States Trustee 615 E. Houston Street, Suite 533 San Antonio, Texas 78205	All those receiving ECF notification in this case and the attached list of the twenty largest unsecured creditors.

/s/ Christopher V. Arisco
Christopher V. Arisco

American Express Customer Care & Billing
P.O. Box 981535
El Paso, Texas 79998

BioDyne
P.O. Box 955967
Sant Louis, MO 63195-5967

Border International Truck – EP
12283 Rojas
El Paso, Texas 79936

Brewer Oil Co.
1025 Wall St.
El Paso, Texas 79915

C&R Distributing, LLC
140 S. Prado
El Paso, TX 79907

Century Rentals
955 Loma Verde Rd.
El Paso, TX 79936

Dump Truck & Loader Service, Inc.
1645 Bessemer
El Paso, Texas 79936

Environmental & Safety Solutions
6044 Gateway Blvd. E., Ste. 303
El Paso, TX 79905

Fuels, LLC
P.O. Box 150990
Ogden, UT 84415

Long Horn Electrical Services, Inc.
2227 Texas Ave.
El Paso, Texas 79901

Office of the Attorney General
Environmental Protection Division
P.O. Box 12548 MC-066
Austin, TX 78711-2548

Prana Machinery
11640 Gateway East Blvd.
El Paso, Texas 79927

Purvis Industries
P.O. Box 540757
Dallas, Texas 75354

Reladyne West, LLC
P.O. Box 955967
Saint Louis, MO 63195-5967

Reliable Asphalt Products
P.O. Box 519
Shelbyville, Kentucky 40066

Sapphire Gas Solutions, LLC
Lockbox/P.O. Box 679262
Dallas, Texas 75267-9262

Terracon
6460 Hillier St., Ste. A
El Paso, Texas 79925

U.S. Small Business Administration
Little Rock Commercial Loan Servicing
Center
2120 Riverfront Drive, Ste. 100
Little Rock, AR 72202

Wagner Equipment Co.
P.O. Box 919000
Denver, CO 80291-9000

Western Explosives Systems Co.
6875 South 900 East
Midvale, UT 84047

20 Largest Unsecured Creditors
Paso Del Norte Materials, LLC